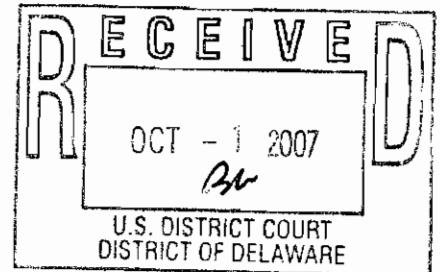


IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE

CA 06-370 JJF

MICHAEL LEE ROSE : Case No. _____
PLAINTIFF : Case I.D. No. _____
#370-(JJF)
V. :
FIRST CORRECTIONAL MEDICAL :
CORRECTIONAL MEDICAL SERVICES :
DR. NIAZ :
DEFENDANT :
:



MOTION FOR ADMISSION

Plaintiff Michael Lee Rose (here after referred to as Rose) request Defendant Correctional Medical Services (here after referred to as C.M.S.) to make the following admissions within thirty (30) days after service of this request. For the purpose of this action only and subject to all pertinent objections as to admissibility which may be interposed at trial.

Each of the following statements are true:

1. Admit Dr. Alie, Dr. Dorsh, Dr. Niaz, Dr. Rogers, Dr. Vandusen, Dr. Mc Donall and Medical Grievance all were aware of my serious medical condition.
2. Admit while contracted for the Delaware Correction system from Medical Services C.M.S. did not provide treatment for my serious medical problems.
3. Admit while being medical provider in 2001 until 2002 for Delaware Correctional system then again from July 1st, 2005 until

now real time the Defendant has brought upon me unnecessary and wanton infliction of pain and a state of mental disarray and anguish.

4. Admit Rose was refused medical drugs for Hepatitis C that other inmates were given such as interferon and other drugs.
5. Admit Rose was taken from Kent County Hospital before recovery in September 2005.
6. Admit Rose was kept in the infirmary until he almost died. Then Captain Henry had Mr. Rose sent to St. Francis Hospital in Wilmington, Delaware; September 2005.
7. Admit that not being treated for this serious disease has lead to a liver transplant or death.
8. Admit Defendants and doctors are qualified to make a diagnosis of Hepatitis C and other medical problems.
9. Admit it does not take an expert opinion to give a medical diagnosis.
10. Admit C.M.S. is refusing a Gall Blatter operation that was ordered by both Dr. Mc Donall and Dr. Vandusen to help my liver condition.
11. Admit C.M.S. knew and still has knowledge that Mr. Rose is in constant and excruciating pain.
12. Admit C.M.S. knew Mr. Rose has lost ¾ of my skin pigment and failed to act on said disorder caused by my liver.
13. Admit this is not an isolated incident.
14. Admit The Medical Grievance Board at the Delaware Correctional Center did or is still currently work for C.M.S. except for the correctional officers that are at the hearings.

15. Admit the Defendants C.M.S. has been brought before the courts a numbers of times for deliberate indifference.
16. Admit C.M.S. does not work under the color of the state.

VERY RESPECTFULLY SUBMITTED

DATED: September 27, 2007


MICHAEL LEE ROSE
SBI#097880
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DE 19977